

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SANDRA HOLDING LTD.,

Petitioner,

V.

FAWZI MUSAED AL SALEH, AHMAD
FAWZI AL SALEH, QUABBIN CAPITAL,
INC., AND JOHN I. SNOW, III,

Respondents.

Case No.

AFFIDAVIT OF THOMAS M. CIAMPA

I, Thomas M. Ciampa, on oath, do depose and say as follows:

1. I am an attorney with the law firm of Ciampa Fray-Witzer, LLP, 20 Park Plaza, Suite 505, Boston, Massachusetts, and a member in good standing of the Bar of the Commonwealth of Massachusetts

2. I am counsel of record for the applicant in the above-captioned matter, Sandra Holding Ltd., and I make this affidavit in support of the applicant's Application for Order Granting Leave to Conduct Discovery for Use in Proceeding in Foreign Tribunal Pursuant to 28 U.S.C. § 1782.

3. Unless otherwise stated, I make the following statements based upon my own personal knowledge.

4. Attached hereto as Exhibit 1 is a proposed subpoena seeking testimony and documents from Fawzi Musaed Al Saleh.

5. Attached hereto as Exhibit 2 is a proposed subpoena seeking testimony and documents from Ahmad Fawzi Al Saleh.

6. Attached hereto as Exhibit 3 is a proposed subpoena seeking testimony and documents from Quabbin Capital, Inc.

7. Attached hereto as Exhibit 4 is a proposed subpoena seeking testimony and documents from John I. Snow, III.

8. Attached hereto as Exhibit 5 is the Shareholder Agreement between, among others, Sandra Holding Ltd. and Universal Enterprises Ltd.

9. Attached hereto as Exhibit 6 are the Articles of Association of M.S.S. Holding Ltd. n/k/a Universal Enterprises Ltd.

Signed under the pains and penalties of perjury this 25th day of September 2018.

/s/ Thomas M. Ciampa
Thomas M. Ciampa